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Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:)
HIGHLAND CAPITAL MANAGEMENT, L.P.,¹) Chapter 11
Reorganized Debtor.) Case No. 19-34054-sgj11
)
)

**STIPULATION EXTENDING DEADLINES
RELATED TO HIGHLAND CAPITAL MANAGEMENT, L.P.'S OBJECTION TO
SCHEDULED CLAIMS 3.65 AND 3.66 OF HIGHLAND CLO MANAGEMENT, LTD.**

This stipulation (the “Stipulation”) is made and entered into by and between Highland Capital Management, L.P., the reorganized debtor in the above-captioned proceeding (“Highland”), and Highland CLO Management, Ltd. (“HCLOM”, and together with Highland, the “Parties”), by and through their respective undersigned counsel.

RECITALS

WHEREAS, on October 16, 2019 (the “Petition Date”), Highland commenced a voluntary

¹ The Reorganized Debtor’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for the Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”).

WHEREAS, on December 4, 2019, the Delaware Court entered an order transferring venue of Highland’s bankruptcy case to this Court [Docket No. 186].

WHEREAS, on September 22, 2020, Highland filed its *Amended Schedules of Assets and Liabilities – Schedule E-F* [see Docket No. 1082] (the “Amended Schedules”) scheduling claim numbers 3.65 and 3.66 on behalf of HCLOM (together, the “HCLOM Scheduled Claim”) on Schedule F of Highland’s Amended Schedules.

WHEREAS, on February 22, 2021, the Court entered the *Order Confirming the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified) and (ii) Granting Related Relief*[Docket No. 1943] (the “Confirmation Order”), which confirmed the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified)* [Docket No. 1808] (the “Plan”).

WHEREAS, the Plan became effective on August 11, 2021 (the “Effective Date”) [Docket No. 2700].

WHEREAS, on February 2, 2023, Highland filed its *Objection to Scheduled Claims 3.65 and 3.66 of Highland CLO Management, Ltd.* [Docket No. 3657] (the “Claim Objection”) objecting to the HCLOM Scheduled Claim.

WHEREAS, on February 16, 2023, Highland filed the *Notice of Hearing* [Docket No. 3668] (the “Hearing Notice”) noticing the hearing on the Claim Objection (the “Claim Objection Hearing”) for March 29, 2023, at 9:30 a.m. (Central Time).

WHEREAS, the Hearing Notice stated that any response (each, a “Response”) to the relief requested in the Claim Objection was required to be filed on or before March 20, 2023, at 5:00

p.m. (Central Time) (the “Response Deadline”).

WHEREAS, the Hearing Notice further stated that Highland’s reply (the “Reply”) to any Response was required to be filed on or before March 27, 2023, at 5:00 p.m. (Central Time) (the “Reply Deadline”).

WHEREAS, in order to provide the Parties with adequate time to prepare their respective prosecution and defense of the Claim Objection, the Parties have agreed to extend certain deadlines related to the Claim Objection and the Claim Objection Hearing consistent with the terms set forth in this Stipulation.

NOW, THEREFORE, it is hereby stipulated and agreed, and upon approval of this Stipulation by the Court, it shall be SO ORDERED:

1. The Response Deadline will be extended to Monday, April 3, 2023, at 5:00 p.m. (Central Time).
2. The Reply Deadline will be extended to Monday, April 10, 2023, at 5:00 p.m. (Central Time).
3. The Claim Objection Hearing will be adjourned to a later date to be determined by the Court and the Parties.
4. The Court shall retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.

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Dated: March 10, 2023

**PACHULSKI STANG ZIEHL & JONES
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